

**REMARKS**

Claims 1, 9-13 and 19 are pending in this application. By this Amendment, claim 1 is amended. Support for the amended claim may be found in the specification, for example, on page 30, lines 14-31. No new matter is added.

Applicants gratefully acknowledge the courtesies extended to Applicants' representative, Ms. Jaquelin Spong, at the October 10 personal interview. The substance of the interview is incorporated into the following remarks, which constitute Applicants' record of the interview.

The Office Action rejects claims 1, 9-11 and 13 under 35 U.S.C. §102(e) over Randell et al. (U.S. Patent 6,415,439; hereafter "Randell"). The rejection is respectfully traversed.

Randell discloses in column 7, lines 26-37, "a controlled device may include pressure or a light sensitive receptors for receiving user input, such as squeezing...if the child squeezes the controlled device's right hand, the controller may direct the controlled device to say, 'No that's my right hand, please squeeze my left hand.' " Therefore, the Office Action asserts that Randell discloses a first morpheme input normally triggering a first default action by the device.

The Office Action further asserts that Randell discloses a second morpheme in column 11, lines 25-35 which disclose "a child touching, squeezing or moving a controlled device 60 in an appropriate manner, the light sensors and/or touch sensors 70 within the controlled device 60 generate status information."

However, Randell does not disclose that the first morpheme and the second morpheme together form a sentence. A sentence is defined on page 30 of the specification as "a sequence of one or more temporally disjoint morphemes. Typically between about one tenth of a second and two to three seconds suffices to distinguish morphemes within a

sentence." There is no relationship between the first morpheme and the second morpheme as disclosed in Randell, and each apparently takes place in isolation from the other. Therefore, as discussed during the personal interview, the first morpheme and the second morpheme disclosed in Randell do not form a sentence.

Moreover, the second morpheme in Randell does not convert "the normally triggered first default action to a second action by the device." According to Randell (col. 11, lines 32-35), "the controller may alter the progression of the audio/video presentation in a manner commensurate with the status information." Therefore, if the second action is to alter the progression of the audio/video presentation, this second action is performed by the controller, not by the controlled device. As discussed during the personal interview, Claim 1 requires that the second action be performed by the same device to which the electro-physical morphemes were input.

Accordingly, Randell does not disclose each and every element of claim 1, and claim 1 is patentable over the cited reference. Claims 9-11 and 13 depend from claim 1, and are patentable for the reasons set forth above, as well as for the additional features they recite. Applicants therefore respectfully request withdrawal of the rejection of claims 1, 9-11 and 13 under 35 U.S.C. §102(e).

The Office Action rejects claim 12 under 35 U.S.C. §103(a) over Randell. However, claim 12 depends from claim 1, and is patentable for the reasons set forth above, as well as for the additional features it recites. Applicants therefore respectfully request withdrawal of the rejection of claim 12 under 35 U.S.C. §103(a).

The Office Action fails to address pending claim 19.

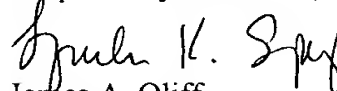
Claim 19 recites "whacking the deformable piece to provide a morpheme input to the device." "Whack" is defined on page 24 of the specification as "the application of an

subregions contact or are contacted by an external object, causing an equal and opposite countering force." Nowhere in Randell is the action of whacking the deformable piece to provide a morpheme input to the device disclosed. Therefore, claim 19 is patentable over the cited reference.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 9-13 and 19 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff

Registration No. 27,075

Jaquelin K. Spong

Registration No. 52,241

JAO:JKS/scg

Date: October 20, 2003

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

**DEPOSIT ACCOUNT USE  
AUTHORIZATION**

Please grant any extension  
necessary for entry;

Charge any fee due to our  
Deposit Account No. 24-0037